

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Ivor Assaye	:	BK. No. 18-10959
Debtor.	:	Chapter No. 13
	:	11 U.S.C. §362
Lakeview Loan Servicing, LLC	:	
Movant,	:	
	:	
v.	:	
	:	
Ivor Assaye and William C. Miller, Trustee,	:	
Respondents.	:	

**DEBTOR’S RESPONSE IN OPPOSITION TO MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

COMES NOW, Debtor by and through his duly authorized undersigned counsel,
and hereby respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. Denied as a conclusion of law to which no response is necessary. Debtor believes
a stipulation will resolve the issue. Debtor requests an updated payment history.

7. Denied as a conclusion of law to which no response is necessary.
8. Denied as a conclusion of law to which no response is necessary.
9. Denied as a conclusion of law to which no response is necessary. Debtor requests
legal fees to be reduced.

WHEREFORE, Debtor respectfully request that this Court enter an Order denying
Movant’s Motion.

March 24, 2020

Law Offices of Georgette Miller, Esq., P.C.

By: /s/ Michelle Lee

Michelle Lee, Esq.

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